

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**RLI INSURANCE COMPANY/** )  
**PLAINTIFF/COUNTERCLAIM** )  
**DEFENDANT** )

**vs.** )  
**TOWN OF MOSSES, ALABAMA, and** )  
**ALICIA SHUFORD-GORDON,** )  
 )  
**Defendants.** )

**Case No.: 2:07-cv-00230-WKW-SRW**

**REPORT OF PARTIES DISCOVERY PLANNING MEETING**

1. Pursuant to Fed. R. Civ. P., 26(f), a meeting was held by telephone conference between Eris Bryan Paul, Counsel for the Plaintiff, Collins Pettaway, Jr., Counsel for the Defendant, Town of Mosses and Alica Shuford-Gordon.

2. Pre-Discovery Disclosures. The parties will exchange by June 25, 2007, the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan.

A. Discovery will be needed on the following subjects: Plaintiff's claims and Defendant's defenses;

B. All discovery shall be commenced in time to be completed by February 29, 2008;

C. A maximum of 40 interrogatories by each party to the other party;

D. A maximum of 20 requests for admissions by each party to the other party;

E. A maximum of 40 requests for production by each party to any other party;

F. A maximum of 5 depositions by Plaintiff and 5 depositions by Defendant;

G. Reports from retained experts under Rule 26(a)(2) shall be due:

From Plaintiff by December 8, 2007;

From Defendant by January 8, 2008;

H. Supplementations under Rule 26(e) due 30 days after receipt of information.

4. Other items:

A. The parties do not request a telephone conference with the Court before entry of the scheduling order.

B. The parties request a pretrial conference in May, 2008.

C. Plaintiff should be allowed until September 29, 2007, to join additional parties and to amend the pleadings.

D. Defendant should be allowed until October 29, 2007, to join additional parties to amend the pleadings.

E. All potentially dispositive motions should be filed by January 8, 2008, Settlement cannot be evaluated prior to the close of discovery.

F. Final lists of witnesses and exhibits shall be due 21 days before trial.

G. Parties shall have 10 days after service of final lists of witnesses and exhibits to list objections.

H. The case should be ready for trial by July 14, 2008, and at this time is expected to take approximately 2 days.

5. Counsel for the Plaintiff is filing this report electronically. Said counsel has permission from Defense counsel Collins Pettaway and Defendant Alicia Shuford-Gordon to affix their electronic signatures. Non-electronic signatures will be maintained by all parties to this action but will not be filed with the Court.

/s/ Eris Bryan Paul  
ERIS BRYAN PAUL ASB-6350-S81P  
Attorney for the Plaintiff, RLI Insurance Company

OF COUNSEL:  
BALL, BALL, MATTHEWS & NOVAK, P.A.  
2000 Interstate Park Drive, Suite 204  
Post Office Box 2148  
Montgomery, Alabama 36102-2148  
Phone: (334) 387-7680  
Fax: (334) 387-3222

/s/ Collins Pettaway  
COLLINS PETTAWAY ASB-9796-W74C  
Attorney for the Defendant, Town of Mosses

OF COUNSEL:  
Chestnut, Sanders & Pettaway  
Post Office Box 1305  
Selma, Alabama 36702

/s/ Alicia Shuford-Gordon  
ALICIA SHUFORD-GORDON  
Pro Se